

## JONES DAY

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May 8, 2020

VIA ECF

The Honorable Judith C. McCarthy  
U.S. Magistrate Judge, Southern District of New York  
The Hon. Charles L. Bricant Jr. Federal Building and United States Courthouse  
300 Quarropas St., White Plains, NY 10601-4105

Re: Keebaugh v. IBM; No. 7:18-cv-12126 (CS) (JCM)

Dear Judge McCarthy:

As discussed during the May 6, 2020 telephone conference, the parties write jointly to propose a schedule for the parties to bring any remaining document discovery disputes before the Court and to request an extension on the current document discovery deadline, which is May 18, 2020. The parties propose the following schedule:

- June 1, 2020 – Date by which the parties will conclude any meet and confer discussions and identify what document discovery disputes remain to bring before the Court.
- June 4, 2020 – Deadline for parties to submit document dispute letters to the Court. The parties will comply with Your Honor's Discovery Order (Dkt. 41) regarding discovery dispute letters and responses.
- June 30, 2020 – Deadline for completion of document discovery. This deadline does not apply to documents identified through deposition testimony.
- Notwithstanding the above-referenced deadlines, the parties are permitted to bring disputes to the Court after the June 1<sup>st</sup> discovery dispute deadline and June 30<sup>th</sup> document discovery deadline if they do not receive by the document discovery deadline documents that they reasonably expected to receive based on the opposing party's discovery responses or meet/confer discussions. Any such disputes shall be brought to the attention of the Court in accordance with the timing set forth in Your Honor's Discovery Order.
- All other dates in the April 7, 2020 Fourth Amended Civil Case Discovery Plan and Scheduling Order (Dkt. 68) will remain the same.

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Should the Court need any additional information, please do not hesitate to contact us.

Respectfully submitted,

s/ Matthew W. Lampe

Matthew W. Lampe

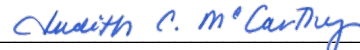
Cc: All counsel of record

**SO ORDERED.**

The Clerk is respectfully requested to terminate the pending motion (Docket No. 70).

Dated: New York, New York

May 11, 2020



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JUDITH C. MCCARTHY  
United States Magistrate Judge